1/2

To: Mr. Persico

From: Nancey Kredell, resident of Seal Beach Concerning Environmental checklist problems City of Seal Beach

JUL - 6 2011

Department of Development Services

Item 2.2 DWP's cleanup and remedial plan.

It is imperative that a full copy of DWP's cleanup and remedial plan be obtained (1980's). Full disclosure of structural cleanup with maps, pictures, and pictures of remaining structures should be included. What was removed and cleaned up and what remains underground. What was adequate and acceptable in the 1980's, may not be acceptable in the present time. We need a complete site and 2 phase cleanup report.

Item 2.4 The new acreage plan is unacceptable! Park/open space changes from 7.49 acres to 6.3 acres. This is 58.9% of the sites 10.7 acres development area increased from 3.21 acres to 4.4 acres, a 37.2% increase! This is not modification by amendment. It is acquisition and capitulation without compensation. In other words theft of land that was to be included in the public domain.

Item 4.0 through 4.18 Further review capitulation This section is rife with statements like "further review" or "further evaluation". These statements include "potentially significant impact" elements. No mitigation is specifically described or recommended. It will be done at a later date. There are over 50 of these statements in this section. It is admittedly and woefully incomplete.

A few critical examples include:

- 4.3 Air quality where no mention of prevailing wind patterns in included. Asbestos deposits-where were they removed or simply covered over.
- 4.4 No adequate mention or description of small mammal and bird usage including migratory bird flocks use of this site as a resting site. This land site sits in the proximity of the North American fly way.
- 4.6 a 2-4 and B. C. and D Ground shaking, liquefaction, soil or underground instability, expansive or sinking soil surfaces.

All programs on this project should cease until the above 4.6 factors have been fully confirmed to not exist. These factors were found on the Hellman property across Pacific Coast Highway 30 or so years ago. These factors stopped a large projected residential development due to safety concerns.

Item 5.0 Lead Agency Determination Regarding the following statement:
Although the proposal could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures have been added.
A mitigated net declaration will be prepared.

As previously stated this finding is not consistent with the data presented and certainly not with the vast amount of data to come "after further review, analysis" etc, etc.

Mr. Persico From Nancey Kredell 2/2

4.18 Mandatory Findings of Significance

a. Potentially significant impact. Further analysis is required

b. Cumulatively considerable means that the incremental effects of a project are considerable when viewed in connection with the effect of past projects, the effects of this project and future projects.

"Cumulatively considerable" is eventually a subjective not an objective decision"

This study gives the reader little confidence that "RBF Consulting" is the entity to make that decision for this site !!!